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Proposed Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re

CHRISTIAN S. RADABAUGH, SR.

Debtor-in-Possession.

Bankruptcy Case No. 18-34244-pcm11

DECLARATION OF CHRISTIAN S.
RADABAUGH SR. IN SUPPORT OF
DEBTOR'S SECOND MOTION FOR
AUTHORITY TO SELL ASSETS
OUTSIDE THE ORDINARY COURSE OF
BUSINESS

I, Christian S. Radabaugh Sr., hereby declare the following under penalty of perjury:

1. I am the Debtor in the above-captioned bankruptcy proceedings.
2. I make this declaration in support of Debtor's Emergency Motion for Authority to Sell Assets Outside the Ordinary Course of Business.
3. I make this declaration based on my personal knowledge, and if called to testify, I would testify as to the facts set forth in this declaration.
4. During the two-week period prior to the filing of the petition, at the request of GP, LLC, I agreed to sell approximately 542 head of cattle through a video auction conducted by Shasta Livestock Auction Yard in Cottonwood, California. The video auction was conducted, and agreements were reached to sell the cattle to buyers, for agreed-upon prices. Pursuant to these

agreements, and pursuant to the Court's earlier order, I delivered the cattle the cattle that were auctioned prior to the petition on Tuesday, December 11th, and Wednesday, December 12th, 2018. The net proceeds from those sales, totaling \$428,793.17, were deposited into Counsel's trust account.

5. Additionally, just prior to the filing of the petition, I agreed to let GP, LLC remove 305 head of cattle, primarily mother cows, and ship such livestock to the Shasta Livestock Auction Yard for sale. The cattle are scheduled to be sold on Friday, December 14, 2018.

6. With respect to the cattle scheduled to be sold on Friday, if that sale does not occur, then I will incur additional costs (with limited funds available) for feed, care, and storage of the cattle at Shasta Livestock that can be avoided by the proposed sale.

7. I do not have the funds necessary to make arrangements to move the cattle in the event the cattle are not sold on December 14, 2018.

8. The sale at Shasta Livestock scheduled for Friday December 14, 2018 will be an arms-length transaction and will be conducted by Shasta Livestock. I believe the auction processed used by the Shasta Livestock Auction Yard is a reasonable process designed to obtain reasonable market value for livestock, and that the sale procedures used by the auction yard are standard for the cattle industry. I believe that the prices that will be obtained for the cattle are fair market prices.

9. I believe that the proposed sale of livestock enable me to significantly pay down the judgment owed to GP, LLC, and will also provide me with cash needed to pay for business and living expenses during the initial months of these bankruptcy proceedings. Payment of the debt owed to GP, LLC will significantly reduce the amount of interest that accrues on the debt each month, and will enable me to pay for business and living expenses.

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I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND UNDERSTAND THAT IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY OF PERJURY IN THE UNITED STATES.

DATED: December 13, 2018

By: /s/ Christian S. Radabaugh Sr.
Christian S. Radabaugh Sr.